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REF: 4WJ-ER

Thomas J. FitzGerald
Kentucky Resources Council
P.O. Box 1070
Frankfort, KY 40602

Dear Mr. FitzGerald:

This letter is in reply to your letter dated 11/4/85 which stated specific concerns related to the Lees Lane Landfill.

Comment: "Has any calculation been made of the anticipated levels of methane and other gas production, and production of volatile organics, over the future life of the landfill? How can a collection system be designed, without knowing the anticipated production levels which it will be designed to handle?"

EPA Response: I am not aware of any calculations being made of the anticipated levels of methane and other gas production, and production of volatile organics, over the future life of the landfill. The gas collection system was designed to prevent the gas in the landfill from migrating to the Riverside Gardens area. Gas production levels were not directly utilized in the design of the system. I have enclosed a copy of the design report which describes the design criteria.

Comment: "Has any testing been conducted by EPA to determine the nature and threat from the 11 unidentified organics that were detected by IT Corporation in the assessment of the gas collection system? What are the constituent toxics being collected and emitted into the community from the gas collection system?"

EPA Response: EPA is currently conducting an air study at and in the vicinity of the site. In this investigation target and nontarget compounds are being identified. Target compounds identified in the parts per billion range were vinyl chloride, benzene, toluene, ethylbenzene, and xylene.

Comment: "The county gas collection system apparently did not include the designed gas burner. What stack monitoring has and will be conducted to determine the organics content of the gas which is now being collected, concentrated and

emitted into the vicinity of the Riverside Gardens neighborhood? What ambient monitoring is being conducted on a continuing basis (rather than on one dry-weather day) to determine the ambient levels of gases in the neighborhood?"

EPA Response: EPA is currently conducting an air study at and in the vicinity of the site. Representative samples are being collected over varied times and climatic conditions. Stack, background, indoor and outdoor samples are being collected.

Comment: "Has any testing or sampling been conducted to determine the nature and constituent wastes in the landfill?"

EPA Response: No, there has not been any testing or sampling conducted to determine the nature and constituent wastes in the landfill. Health risks associated with drilling through the fill precluded drilling through the landfill.

Comment: "What testing has been conducted at the Putman Avenue sites where the high concentrations of methane and organic-laden gases were first detected in 1975 in order to determine whether the county gas collection system is functioning so as to control gas migration? What testing will be conducted to determine the current degree of gas migration?"

EPA Response: Two residences on Putman Avenue have been selected as target areas for sampling during the current air investigation being conducted by EPA.

Comment: "What follow-up drilling will be conducted on-site to determine actual depth of stored waste?"

EPA Response: At this point in the investigation, there is no follow-up drilling on-site planned. The actual depth of the stored waste will be a major factor only if excavation is chosen as an alternative. Due to the health risks associated with drilling through the fill it is not being considered at this time.

Sincerely,

Beverly Houston
Remedial Project Manager
Emergency and Remedial
Response Branch

Enclosure